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Of Attorneys for Debtor-in-Possession

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF OREGON

In re)	Case No. 16-30406-rld11
)	
SeaPort Airlines, Inc.,)	
)	
Debtor-in-Possession.)	
SeaPort Airlines, Inc.,)	Adv. Pro. No. 16-03059-rld
)	
Plaintiff,)	MOTION FOR ORDER TO SHOW CAUSE
)	
vs.)	EXPEDITED HEARING REQUESTED
)	
Robert McKinney)	
)	
Defendant.)	

Pursuant to 11 U.S.C. §105(a) and FRBP 7001(a) and 7065, Plaintiff SeaPort Airlines, Inc. ("SeaPort") moves this Court for AN ORDER REQUIRING Defendant Robert McKinney to appear and show cause, if any, why a preliminary injunction shall not issue:

1. Ordering McKinney to withdraw and to dismiss the post-petition whistleblower complaint filed with the Occupational Health and Safety Administration ("OSHA") without prejudice;

2. Restraining McKinney from continuing to prosecute the OSHA complaint; and
3. Restraining McKinney from prosecuting any other pre-petition claims against SeaPort.

Attached hereto as **Exhibit A** is a copy of the proposed from of Order to Show Cause. The requested preliminary injunction will remain in effect through dismissal of the case, conversion of the case to a case under Chapter 7 of the Bankruptcy Code, or entry of discharge. This motion is supported by SeaPort's Complaint filed in this Adversary Proceeding, the Memorandum in Support of an Order for Preliminary Injunction and Motion for Order to Show Cause, the Declaration of Nelson D. Atkin II, and the Court's records and file in this Adversary Proceeding and in the Main Case.

Respectfully submitted;

VANDEN BOS & CHAPMAN, LLP

By: /s/Robert J Vanden Bos
Robert J Vanden Bos, OSB #78100
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SeaPort Airlines, Inc.,)	
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Debtor-in-Possession.)	
SeaPort Airlines, Inc.,)	Adv. Pro. No. 16-03059-rld
)	
Plaintiff,)	ORDER TO SHOW CAUSE
)	
vs.)	
)	
Robert McKinney,)	
)	
Defendant.)	

TO: Robert McKinney, Defendant

Based on Plaintiff SeaPort Airline's ("SeaPort") Motion for Order Show Cause, Motion for Temporary Restraining Order, Memorandum in Support, and the Declaration of Nelson D. Atkin II, and the Court being otherwise fully advised,

IT IS HEREBY ORDERED THAT Defendant Robert McKinney ("McKinney") appear on the _____ day of _____, 2016, at __:__ in Courtroom _____ of the

United States Bankruptcy Court located at 1001 SW 5th Ave., Suite 700, Portland, OR 97204 and show cause, if any, why the Court should not enter an Order:

1. Ordering McKinney to withdraw and to dismiss the post-petition whistleblower complaint filed with the Occupational Health and Safety Administration ("OSHA") without prejudice;
2. Restraining McKinney from continuing to prosecute the OSHA complaint;
3. Restraining McKinney from prosecuting any other pre-petition claims against SeaPort;
4. Enjoining and prohibiting Defendants from engaging in any collection efforts against Plaintiffs without an order of this Court; and
5. Containing such further relief as the Court deems appropriate.

Defendants' failure to appear at the hearing may result in entry of an order of default granting the relief requested in the motion.

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PRESENTED BY:

/s/Robert J Vanden Bos
Robert J Vanden Bos OSB #78100
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Of Attorneys for Debtor-in-Possession

First Class Mail:

SeaPort Airlines, Inc.
Attn: Timothy Sieber
816 SW First Avenue
Portland, Oregon 97204

Electronic Mail:

The foregoing was served on all CM/ECF participants through the Court's Case Management/ Electronic Case File system.

In re SeaPort Airlines, Inc.;
Chapter 11 Bankruptcy Case No. 16-30406-rld11
SeaPort Airlines, Inc. v. Robert McKinney;
Adv. Pro. No. 16-03059-rld

CERTIFICATE - TRUE COPY

DATE: May 13, 2016

DOCUMENT: MOTION FOR ORDER TO SHOW CAUSE
EXPEDITED HEARING REQUESTED

I hereby certify that I prepared the foregoing copy of the foregoing named document and have carefully compared the same with the original thereof and it is a correct copy therefrom and of the whole thereof.

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing on:

SeaPort Airlines, Inc.
Attn: Timothy Sieber
816 SW First Avenue
Portland, Oregon 97204

Rob McKinney
9502 NE 144th Ct
Vancouver, WA 98682

by mailing a copy of the above-named document to each of them in a sealed envelope, addressed to each of them at his or her last known address. Said envelopes were deposited in the Post Office at Portland, Oregon, on the below date, postage prepaid.

I hereby certify that the foregoing was served on all CM/ECF participants through the Court's Case Management/Electronic Case File system on the date set forth below.

Dated: May 13, 2016

VANDEN BOS & CHAPMAN, LLP

By: /s/Robert J Vanden Bos
Robert J Vanden Bos, OSB #78100
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